



**Department of Energy**

**Ohio Field Office  
Fernald Area Office**

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OCT 29 1999

Mr. James A. Saric, Remedial Project Manager  
U.S. Environmental Protection Agency  
Region V-SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0077-00

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS ON THE PROJECT SPECIFIC PLAN FOR AREA 3A/4A SUBSURFACE  
PREDESIGN INVESTIGATION**

Enclosed are responses to the Ohio Environmental Protection Agency comments on the Project Specific Plan (PSP) for Area 3A/4A Subsurface Predesign Investigation. Following Agency approval, these responses will be incorporated into a Variance/Field Change Notice to this PSP.

If you have any questions or concerns regarding these responses, please contact Robert Janke at (513) 648-3124.

Sincerely,

Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:R.J. Janke

Enclosure



Recycled and Recyclable



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Mr. James A. Saric  
Mr. Tom Schneider

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cc w/enclosure:

T. Schneider, OEPA-Dayton (three copies of enclosure)  
F. Barker, Tetra Tech  
AR Coordinator, FDF/78

cc w/o enclosure:

R. Abitz, FDF/52-0  
D. Carr, FDF/52-2  
J. D. Chiou, FDF/52-0  
T. Hagen, FDF/52-0  
C. Messerly, FDF/52-0  
W. Westerman, FDF/52-0  
ECDC, FDF/52-78

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Mr. James A. Saric  
Mr. Tom Schneider

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bcc w/enclosure:  
R. J. Janke, OH/FEMP  
M. Davis, ANL

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**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS  
ON THE PROJECT SPECIFIC PLAN FOR  
AREA 3A/4A SUBSURFACE PREDESIGN INVESTIGATION  
(20200-PSP-0005, REVISION 0)**

Commenting Organization: Ohio EPA  
Section #: General                      Page #:                      Line #:                      Commentor: OFFO  
Original Comment #: 1  
Code: C  
Comment: This document does not provide line numbers. In future submittals, please provide the numbers.

Response: Agreed. Line numbers will be included on all future submittals.

Action: No action is required for this PSP. Future documents will include line numbers.

Commenting Organization: Ohio EPA  
Section #: 1.1                      Page #: 1-1                      Line #: Third Bullet                      Commentor: OFFO  
Original Comment #: 2  
Code: C  
Comment: Figure 1-1 does not show the high leachability areas in Area 3A/4A. Please correct.

Response: Agreed. The outline of the high leachability areas was inadvertently forgotten on Figure 1-1.

Action: A revised Figure 1-1 is attached to these comment responses. This revised figure will be included in a future Variance/Field Change Notice to the PSP.

Commenting Organization: Ohio EPA  
Section #: 1.2                      Page #: 1-2                      Line #: First Full Paragraph                      Commentor: OFFO  
Original Comment #: 3  
Code: C  
Comment: Project Specific Plans are to be submitted to Ohio EPA and USEPA for any sampling projects to be conducted at Fernald. Along with, Ohio EPA and USEPA's approval must be given before DOE starts work. This was not the case on this PSP for Area 3A/4A project. In addition, any sampling activity that may take place once excavation begins should also be outlined in the excavation PSP in place at the time. This should also include closure sampling activities for any HWMU and UST.

DOE should follow the "lessons learned" during the excavation of the A1P2 Sewage Treatment Plan regarding HWMUs and USTs. Sampling and closure should be done before any other excavation activities are begun.

Response: As mentioned in the August 20, 1999 document transmittal letter (DOE-1054-99) and discussed in telephone conversations on August 24, 1999, subsurface field sampling was started "at risk" prior to agency approval due to a tight schedule to provide characterization data for the excavation design of Areas 3A and 4A. This early start does not limit additional sampling due to comments from the agencies and will maximize the amount of data that can be incorporated in the draft IRDP, which is due

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to EPA in March 2000. However, in order to avoid this situation in the future, the schedules for PSP development will be re-evaluated to ensure that adequate time has been provided for EPA and OEPA review, including responding to agency comments, prior to the start of field sampling. To keep EPA and OEPA informed of sampling activities as work progresses, DOE will also provide PSP variances to EPA and OEPA in a more timely manner, especially those variances that add/cancel sample locations or significantly change the sampling strategy outlined in the PSP.

Although any additional samples resulting from EPA and OEPA comments on the PSP will be collected, DOE would like to emphasize that proceeding with field work "at risk" is not the preferred mode of operation. Up-front consensus between FDF, DOE, EPA, and OEPA is always DOE's goal. By re-evaluating schedules for submittal of PSPs, keeping the agency better informed of modifications to sampling PSPs, and bringing more attention to this issue, DOE will work to avoid this situation in the future.

Although the Area 3A/4A Subsurface Predesign PSP does not address HWMU or UST sampling or closure, lessons learned from the STP Project will be taken into consideration when developing the Area 3A/4A IRDP Implementation Plan and Excavation Monitoring PSP.

Action: As noted in response.

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: 2.2

Page #: 2-2

Line #: First Full Paragraph

Code: C

Original Comment #: 4

Comment: The sampling method discussed in this paragraph states that the uppermost sampling interval will contain <50% gravel, and that remaining debris in the samples will be removed. Ohio EPA recommends to start sampling when gravel is less than 15% of the interval. It is not appropriate to remove such a large portion of the sample matrix. Additionally, all gravel will need to go to the OSDF assuming it passes WAC.

Response: Fifty percent gravel was chosen as the criteria for the first interval of soil samples for two major reasons: 1) a 50 percent soil gravel mixture is easy to visually determine in the field; and 2) this is consistent with other PSPs for Area 3A/4A. As noted in the comment, gravel will have to meet the OSDF WAC to be eligible for on-site disposal. For this reason, gravel is not removed from the sample interval but is ground and dried with the soil prior to analysis. In addition, real-time scanning is being performed on exposed gravel surfaces in Area 3A/4A to identify any areas that exceed the OSDF WAC.

Action: No action.

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Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: Figure 2-1

Page #:

Line #:

Code: C

Original Comment #: 5

Comment: In Figure 2-1, boring #12486 is somewhat remote from the other locations proposed. Is this location based on historical data?

Response: Boring 12486 is a high-leachability boring (see Figure 3-2), not a proposed above-WAC boring. It was inadvertently included on Figure 2-1.

Action: A revised Figure 2-1 is attached to these comment responses. This revised figure will be included in a future Variance/Field Change Notice to the PSP.

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: 3.2

Page #: 3-2

Line #: Second Paragraph

Code: C

Original Comment #: 6

Comment: The sampling intervals in Appendix D do not correspond with the wording in this paragraph. For example, the text states that there will be "three foot spacing going down the length of a boring" however, Appendix D shows the spacing falls somewhere in the middle. Also, the first intervals may not be staggered in each boring. Please clarify the sampling strategy in the text.

Response: Agreed. Section 3.1 explains the strategy that was used to determine the boring locations and sample interval depths (i.e., suspected depth of uranium contamination and areas with data gaps). The text in Section 3.2 will be revised to provide information that directly pertains to sample collection methods.

Action: The first three sentences of the second paragraph of Section 3.2 will be revised to read, "Soil samples will be collected from 1-foot intervals as identified in Appendix D."

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11-001-1999

STATE PLANNING COORDINATE SYSTEM 1983

11-001-1999

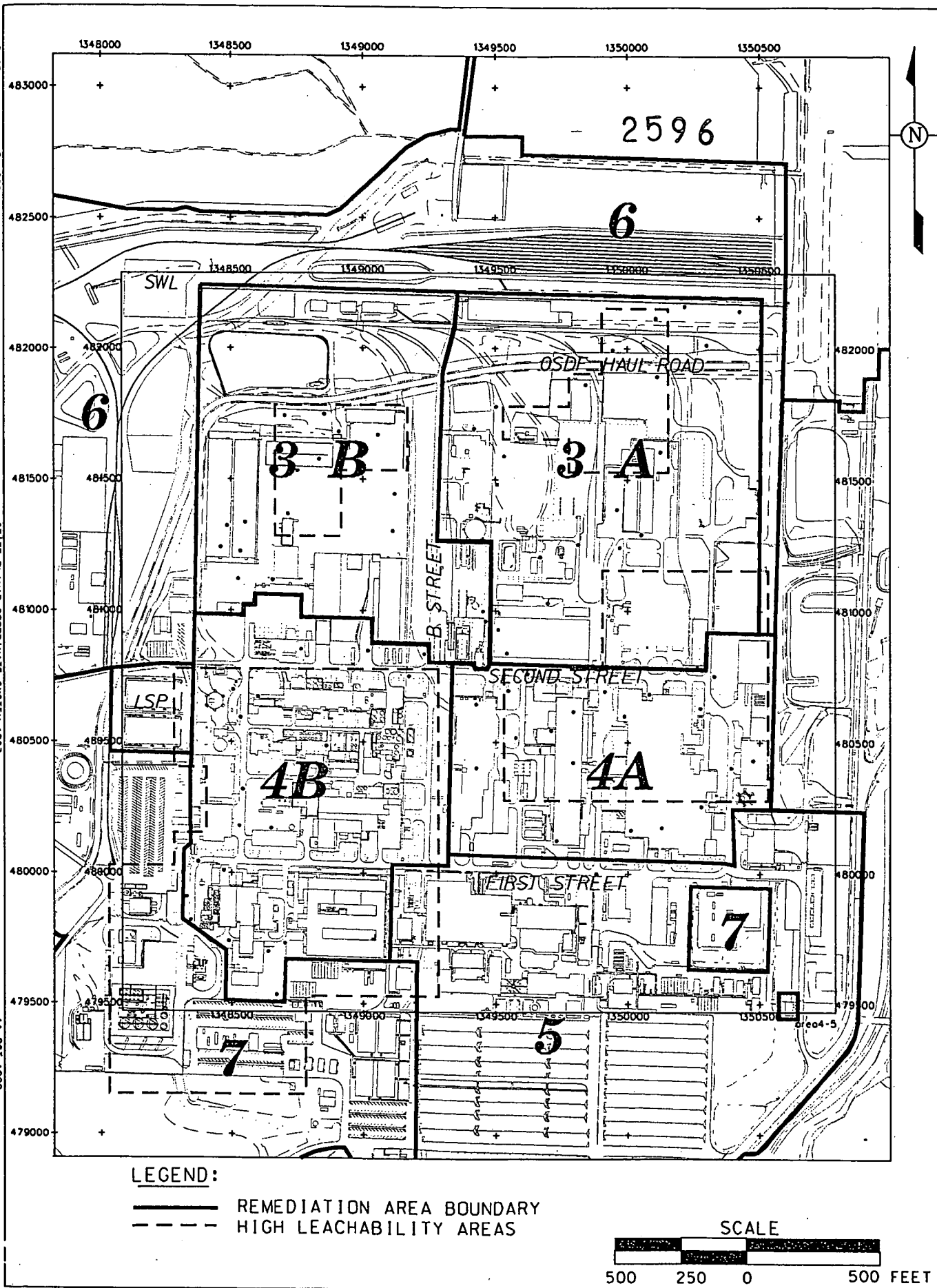


FIGURE 1-1. LOCATION OF AREAS 3A/4A

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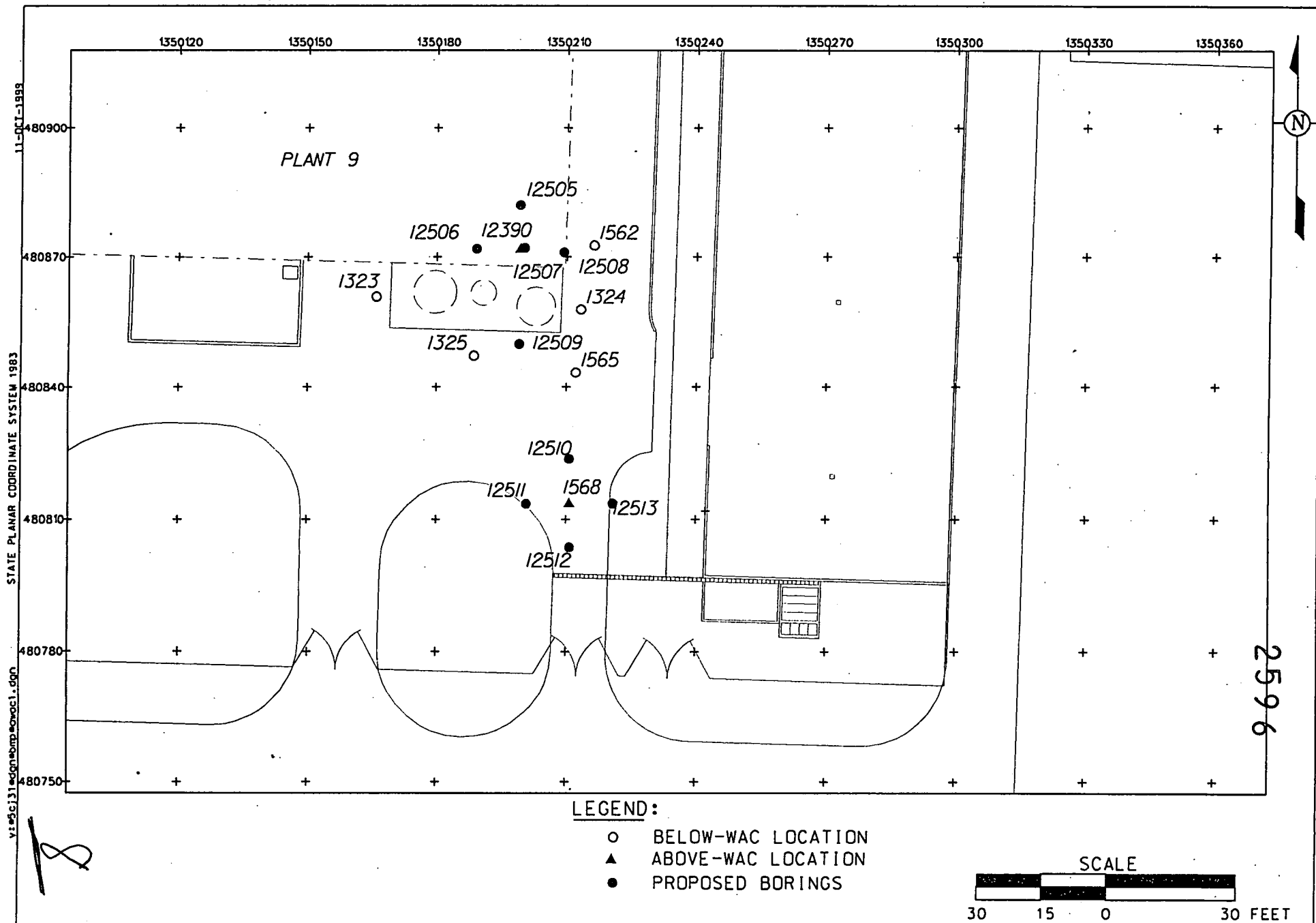


FIGURE 2-1. ABOVE-WAC LOCATIONS, PROPOSED BORINGS AND EXISTING BELOW-WAC LOCATIONS NEAR PLANT 9